

**Linda J. Larkin, OSB# 792954**  
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**BENNETT HARTMAN, LLP**  
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**Of Attorneys for All Plaintiffs**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

TIMOTHY J. GAUTHIER AND GARTH  
BACHMAN, TRUSTEES OF THE OREGON AND  
SOUTHWEST WASHINGTON NECA-IBEW  
ELECTRICAL WORKERS AUDIT COMMITTEE,  
Plaintiffs,

Civil No. 3:19-cv-01177-MO

vs.

MOTION FOR DISMISSAL

CROWN VOLTAGE, INC. a Washington  
Corporation; DANIEL TUCKER, individually; and  
STACY LACOMBE, individually,

Defendants.

Plaintiffs, through their attorney, Linda J. Larkin, move the court for an order to  
dismiss the above entitled action. Said dismissal shall be without prejudice with respect

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MOTION FOR DISMISSAL

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to any amounts claimed due by Plaintiffs, and amounts which might be claimed due by way of counterclaim, for which this action was brought.

IT IS SO MOVED this 15<sup>th</sup> day of October, 2019.

s/Linda J. Larkin  
Linda J. Larkin, OSB# 792954  
Telephone: 503-227-4600  
E-mail: [linda@bennetthartman.com](mailto:linda@bennetthartman.com)  
Attorney for Plaintiffs

**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing **MOTION FOR DISMISSAL** on:

Daniel Tucker  
1403 SW Columbia Ridge Dr.  
Vancouver, WA 98664  
Defendant  
Daniel W. Tucker, President  
Crown Voltage, Inc.  
1403 SE Columbia Ridge Dr.  
Vancouver, WA 98664  
Defendant  
Stacy LaCombe  
1403 SE Columbia Ridge Dr.  
Vancouver, WA 98664  
Defendant

by the following indicated method or methods:

by mailing a copy thereof in a sealed, first-class postage-paid envelope, addressed to the party(ies) listed above, and deposited with the United States Postal Service at Portland, Oregon, on the date set forth below.

Dated this 15<sup>th</sup> day of October, 2019.

/s/Linda J. Larkin  
Linda J. Larkin, OSB No. 792954  
[linda@bennethartman.com](mailto:linda@bennethartman.com)  
Attorney for Plaintiffs  
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